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13 State Farm Mutual Auto Insurance Company

8 **DISTRICT COURT**
9 **CLARK COUNTY, NEVADA**

10 THOMAS A. WUNDERLICH,

11 Plaintiff,

12 v.

13 STATE FARM MUTUAL AUTOMOBILE
14 INSURANCE COMPANY

15 Defendant

2:21-cv-00486-JAD-EJY

**STIPULATION AND ORDER TO
CONTINUE JOINT PRETRIAL
ORDER DEADLINE
(SECOND REQUEST TO EXTEND
DEADLINE FOR JOINT
PRETRIAL ORDER)**

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17 Plaintiff THOMAS A. WUNDERLICH, through his counsel The Cottle Firm,
18 Defendants STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY
19 (hereinafter "Defendant"), through their counsel Sean D. Cooney, Esq., of Carmen
20 Cooney, Forbush, PLLC, pursuant to Local Rule IA 6-1 and 26-3 hereby stipulate
21 and agree to a thirty (30) day extension of the deadline to file the Joint Pretrial
22 Order. This is the second request for an extension of the Pretrial Order and is
23 entered in good faith without any intent to delay.



CARMAN COONEY FORBUSH
PLLC

A. EXTENSION OF DEADLINE TO FILE JOINT PRETRIAL ORDER:

The parties are seeking to extend the deadline to file the Joint Pretrial Order to December 7, 2023.

B. REASON WHY THIS STIPULATION IS NEEDED:

The parties are currently engaging in settlement negotiations and are \$40,000 apart. With a strong possibility of settlement, the parties wish to save the unnecessary expense of preparing a pretrial order. In addition, a partner with the office for defense counsel left the firm on December 1, 2023, and his workload had to be distributed throughout November in anticipation of his departure.

C. REASON WHY JOINT PRETRIAL ORDER WAS NOT COMPLETED:

The parties are extending the deadline to file the Joint Pretrial Order due to ongoing settlement negotiations. If the parties are unable to resolve this case an extension would allow sufficient time for the parties to meet and confer regarding stipulated exhibits, witnesses and other matters in relation to the trial. The parties submit these reasons constitute good cause under LR 26-3 for the extension.

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1 This Stipulation is made in good faith and not for the purpose of delay.

2 DATED this 7th day of December, 2023.

3 **THE COTTLE FIRM**

**CARMAN COONEY FORBUSH
PLLC**

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5 By: /s/ Robert W. Cottle

By: /s/ Sean Cooney

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10 *Attorneys for Defendants*

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12 **IT IS SO ORDERED.**

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15 UNITED STATES MAGISTRATE JUDGE

16 Dated: December 7, 2023
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CARMAN COONEY FORBUSH
PLLC